

The Honorable Marsha J. Pechman

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

DEBI HUMANN,

Plaintiff,

vs.

CITY OF EDMONDS, a municipal
corporation; and MICHEAL COOPER, in his
individual and official capacities,

Defendants.

CASE NO.: 2:13-cv-00101-MJP

**PLAINTIFF'S VOIR DIRE
QUESTIONS**

Plaintiff proposes the following voir dire questions:

1. Do any of you recognize, or have you heard of, plaintiff Debi Humann?
2. Do any of you recognize, or have you heard of, defendant Michael Cooper?
3. Does anyone live in Edmonds?
4. Does anyone work for the City of Edmonds?
5. Does anyone live in Snohomish County?
6. Does anyone know any of the attorneys?
 - a. Beth Barrett Bloom
 - b. Jillian M. Cutler
 - c. Jayne L. Freeman
 - d. John Kugler

- 1 7. Does anyone know the judge and/or any of the courtroom employees?
- 2 8. Does any member of the jury panel know another panel member?
- 3 9. Does anyone read the *Seattle Times*?
- 4 10. Does anyone read the *Everett Herald*?
- 5 11. Has anyone ever served as a juror in a criminal trial?
- 6 12. Has anyone ever served as a juror in a civil trial?
- 7 13. Has anyone ever served as a grand juror?
- 8 14. If you have served as a juror, did the jury reach a verdict?
- 9 15. Does anyone need an accommodation to help you listen or sit during the trial?
- 10 16. Has anyone ever been involved in a legal dispute – meaning a claim or a law suit?
- 11 17. Does anyone have a family member who has been involved in a legal dispute –
- 12 meaning a claim or a law suit?
- 13 18. Does anyone have a friend who has been involved in a legal dispute – meaning a
- 14 claim or a law suit?
- 15 19. If you, a family member, or friend has been involved in a legal dispute, did the dispute
- 16 involve an employment matter?
- 17 20. Does anyone believe that if something bad happens to someone, it is usually that
- 18 person's fault?
- 19 21. Does anyone feel that employees should not sue employers for being treated badly in
- 20 the workplace?
- 21 22. Does anyone believe juries usually award too much money?
- 22 23. Does anyone believe that people should be awarded damages for pain and suffering
- 23 only if they have been injured physically?
- 24 24. Would anyone have difficulty awarding monetary compensation for emotional
- 25 distress, humiliation, embarrassment, or damage to professional reputation?
- 26 25. Does anyone have specialized knowledge – meaning education or training – in human
- 27 resource management?
- 28

- 1 26. Has anyone, or a close family member, ever had difficulty in finding a job?
- 2 27. Has anyone ever been fired from a job?
- 3 28. Has anyone ever supervised other employees as part of their job?
- 4 29. Has anyone here ever made the decision to fire another employee?
- 5 30. Does anyone have any specific beliefs or opinions about people who report
6 government corruption or misuse of public funds that would make it difficult for you
7 to be fair and impartial in this case, which involves alleged retaliation against a
8 whistleblower?
- 9 31. Does anyone have any specific beliefs or opinions about lawsuits against the
10 Government that would make it difficult for you to be fair and impartial in this case,
11 which involves a lawsuit against the City of Edmonds?
- 12 32. Having heard the questions put to you by the court, does any other reason suggest
13 itself to you as to why you could not sit on this jury and render a fair verdict based on
14 evidence presented to you and in the context of the court's instructions to you on the
15 law?
- 16 33. The court staff passed along a list of witnesses expected to testify at trial. Do any of
17 you know the witnesses?

18 A. Witness List

- 19 1) Nancy Bartley
- 20 2) Steve Bernheim
- 21 3) Diane Buckshnis
- 22 4) Sharon Cates
- 23 5) Sandy Chase
- 24 6) Stephen Clifton
- 25 7) Kimberly Cole
- 26 8) Al Compaan
- 27 9) Claire Cordon
- 28 10) Susan Coskey
- 11) Courtney Craft
- 12) Adrienne Fraley-Monillas

- 13) Don Gough
- 14) Gary Haakenson
- 15) Oscar Halpert
- 16) MaryAnn Hardie
- 17) Carrie Hite
- 18) Shawn Hunstock
- 19) Debbie Karber
- 20) Mary Leider
- 21) Norma Middleton
- 22) Scott Passey
- 23) Robert T. Patton
- 24) Strom Peterson
- 25) Lora Petso
- 26) K. Michael Plunkett
- 27) Pat Ratliff
- 28) Sheila Romoff
- 29) Loren Simmonds
- 30) Jeff Taraday
- 31) Jim Tarte
- 32) Sheila D. Underwood
- 33) Bob Uptagraft
- 34) Mia Wadleigh
- 35) James C. Webber
- 36) Phil Williams
- 37) D.J. Wilson
- 38) Teresa Wippel

//

1 Respectfully submitted this 10th day of September, 2014.

2
3 FRANK FREED SUBIT & THOMAS, LLP

4
5 By: /s/Jillian M. Cutler
6 Jillian M. Cutler, WSBA #39305
7 Beth Barrett Bloom, WSBA #31702
8 Email: jcutler@frankfreed.com
9 bbloom@frankfreed.com
10 Attorneys for Plaintiff Debi Humann
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF ELECTRONIC FILING

I, Sheila Romoff, hereby certify that on September 10, 2014, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Attorneys for Defendants City of Edmonds

Jayne L. Freeman
Keating, Bucklin & McCormack
800 Fifth Avenue, Suite 4141
Seattle, WA 98104-3175

Attorneys for Defendant Micheal Cooper

John T. Kugler
Turner Kugler Law, PLLC
4700 42nd Ave. SW, Suite 5940
Seattle, WA 98116

I also hereby certify that I have mailed by U.S. Postal Service, First Class Postage prepaid, the foregoing document to the following non-CM/ECF participants: NONE.

DATED this 10th day of September, 2014 at Seattle, Washington.



Sheila Romoff